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Johanna Kovarik
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987 McClellan Rd
Vancouver, WA 98664,

Electronic submission of this Comment Letter was made via the Project Website at <https://cara.fs2c.usda.gov/Public/CommentInput?Project=65884>.

Re: OBJECTION to the Gifford Pinchot National Forest Final Environmental Assessment – Forest Wide Plantation Thinning & Potential Control Line Treatments Project # 65884

Ladies and Gentlemen,

Please accept this Letter as the Sierra Club, Washington State Chapter's Objection to the referenced Project.

Except as stated within this Objection Letter, the Sierra Club restates, and incorporates herein by reference, all of its Comments in the Sierra Club Comment Letter dated May 2, 2025 to Johanna Kovarik, Forest Supervisor of the Gifford Pinchot National Forest, (referred to herein as the "Comment Letter"), as *Objections to the* proposed Project.

In addition, except as stated in this Objection Letter, the Sierra Club disagrees with the Forest Service's statements and conclusions in the July 1, 2025 Draft Notice of Decision/FONSI, the Appendix D July, 2025 Responses to Comments, and the July, 2025 Final Environmental Assessment, insofar as the statements and conclusions address specific comments raised by the Sierra Club.

Therefore, the Sierra Club is submitting this Objection Letter.

1. The Sierra Club appreciates the Forest Service's acceptance of the Sierra Club's comment #35 (on page 172 of the Final EA) on the need to follow REO Memo 964, and the Sierra Club appreciates the revision made to page 31 of the Final EA regarding the **REO Memo 964 prohibition on cutting trees in LSRs over 20" DBH**.

However, the Forest Service left original but inconsistent language in the Final EA on page 42 enumerating the possibility of other criteria for cutting trees over 20" DBH.

- a. For consistency with the added language on page 31 which prohibits removal of trees in LSRs which exceed 20" DBH following REO Memo 964, the Forest Service must correct page 42 by removing from the first full paragraph on that page all sentences except for the first sentence, and replacing those removed sentences with the following as the conclusion of the remaining first sentence:
 - i. *" ; including, but not limited to, the provisions previously discussed on page 31 that require compliance with the 1994 REO Memo 964 and its provisions regarding the limitations on both cutting trees in LSRs which exceed 20" DBH, and the requirement to leave in place any trees over 20" DBH which are cut in accordance with the explicit limitations and restrictions in REO Memo 964."*
 - b. If the Forest Service does not agree to revise, as requested above, the paragraph described above on page 42 of the Final EA, the Sierra Club restates as an Objection its original comment addressing the REO Memo 964 requirements regarding trees in LSRs exceeding 20" DBH.
2. The Sierra Club objects to the Forest Service's failure to adopt the **Sierra Club's Comment #60 (as listed on page 181 of Appendix D to the Final EA) that the Forest Service follow the Northwest Forest Plan's Standards and Guidelines (the "NWFP S&G") prohibiting the cutting of LSR trees older than 80 years:**
 - a. Although the Forest Service states in Appendix D, Responses to Comments, that it does not want to go back to the USFWS or the NMFS for approval for adding such a prohibition, the Forest Service merely should include in its contracts for sale and for stewardship the contractual requirement that LSR trees and stands be aged at the date of cut/harvest rather than 'at time of award'. The Forest Service stated in the Response to the Sierra Club's Comment #60 that they will not change their identification in the EA "that stands will be less than 80 years old at the time of award", rather than the Sierra Club's request for aging at date of cut/harvest.

- b. Such a contractual provision would not require the approval of either the USFWS or the NMFS. Including the requested provision in Sale and Stewardship Contracts would meet the mandate of the NWFP S&G to not cut LSR trees older than 80 years.
- c. Similarly, the Forest Service by including such a contractual provision would address the concerns that arise with contract extensions being beyond the Forest Service's control, by merely requiring the aging of trees at the date of cut/harvest. This is of particular concern in the context of possible extensions sometimes as much as 10 years, per the Forest Service's response to SC Comment #60.
- d. Failure to require aging of trees prior to cut/harvest does result in violation of the NWFP's purpose and intent, as when buyers inevitably hold stands for market maximization, trees will age out and thus include trees over 80 years of age at actual cut/harvest.
- e. The NWFP Standards & Guidelines at C-12 states: "*West of the Cascades - There is no harvest allowed in stands over 80 years old.*"
- f. In addition, failure to require such contractual language that *LSR trees and stands be aged at the date of cut/harvest* would also result in the sale or stewardship not being in compliance with the Peachman Exceptions, which apply only to thinning stands younger than 80 years old, see page 68 and 76 of the Final EA.
- g. We are aware of the pressure from the logging industry to change the date of aging to the date that the Final Decision is issued (see comments of AFRC and Hampton, and the Forest Service's responses included in Appendix D), and we respect the Forest Service's goal of satisfying both the timber industry and the Sierra Club, but the mandate in the NWFP is clear: *no trees are to be cut over 80 years of age.*
- h. There is no carveout in the NWFP or in the S&G or the Peachman Exceptions for determining the age at any other time than at the time of cutting, and the Forest Service must follow that directive.

3. The Sierra Club appreciates and acknowledges the Forest Service's acceptance and incorporation of the Sierra Club's following comments as indicated in Appendix D to the Final EA. Note that the page references below are to the Final EA which includes Appendix D in the Final EA's pagination:

- a. Page 165 SC #19
- b. Page 165 SC #20

- c. Page 169 SC # 29
- d. Page 172 SC #35 as noted above in this Objection Letter, the Sierra Club requests further revision to the Final EA to reflect the Forest Service's Response in Appendix D to SC #35 to change not only page 31 of the Final EA but also to change page 42 as requested above. If the Forest Service does not change page 42, the Sierra Club *objects* to the Forest Service's Response to SC # 35.
- e. Page 173 SC #36
- f. Page 173 SC #38
- g. page 181 SC #62
- h. page 184 SC# 70
- i. Page 184 SC#71
- j. Page 185 SC #72
- k. Page 185SC #73
- l. Page 185 SC #74:

4. We suggest that the Forest Service include a clarification in the Final EA, on page 9, between the following two statements:

- a. on page 9 of the Final EA
 - i. *"The Forest Wide Plantation Thinning and Potential Control Line Treatments Project is located across the entirety of the GPNF" and*
- b. on page 172 (Appendix D) of the Final EA the Forest Service's Response to the SC #34 comment,
 - i. *"The PCL network on the Forest is much larger than those designated for this project. After discussions with our collaborative partners, it was determined that the entire Forest PCL network would not be appropriate for this project."*

We suggest that the Forest Service add the above sentence, found on page 172, to the body of the Final EA, on page 9, as a clarification.

5. Except as otherwise stated in this Objection Letter, the Sierra Club restates and incorporates herein by reference as Objections all of its comments provided in the Sierra Club Comment Letter dated May 2, 2025.

We are not further reiterating our arguments and comments raised in the Comment Letter, and let the Comment Letter, as incorporated herein by reference, subject to the terms of this Objection Letter, speak for itself as the Sierra Club's Objection.

We appreciate the opportunity to comment on this important federal action. Please keep us informed about next steps in the planning process and do keep us on the mailing list for any follow-on actions.

Please address future communications, emails or telephone calls regarding this project to the National Forest Committee, WA Chapter of the Sierra Club, to the following:

- Nete Olsen at neteolsen01@gmail.com and (206) 713-7128, and
- Amy Mower at almower@earthlink.net and (360) 305-2922.

Sincerely,

SIERRA CLUB, WA State Chapter
National Forest Committee

Nete Olsen, member of the National Forest Committee
Amy Mower, member of the National Forest Committee

cc. Joshua Chapman